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JAN 25 2018

***Via Certified Mail –***
***Return Receipt Requested***

January 22, 2018

Mike Lynch - Wastewater Supervisor
Municipal Operations Dept.
Wastewater Division
City of Newport Beach
100 Civic Center Drive
Newport Beach, CA 92660

David Kiff - City Manager
Members of the City Council
City of Newport Beach
100 Civic Center Drive
Newport Beach, CA 92660

**Re: Notice of Violations and Intent to File Suit Under the Federal Water Pollution Control Act (Clean Water Act)**

Dear Mr. Lynch, Mr. Kiff, and Members of the City Council:

**STATUTORY NOTICE**

This Notice is provided on behalf of California River Watch ("River Watch") with regard to violations of the Clean Water Act ("CWA" or "Act"), 33 U.S.C. § 1251 *et seq.*, that River Watch alleges are occurring through the ownership and operation of the City of Newport Beach's sewage collection system.

River Watch hereby places the City of Newport Beach ("the City") on notice that following the expiration of sixty (60) days from the date of this Notice, River Watch will be entitled under CWA § 505(a), 33 U.S.C. § 1365(a), to bring suit in the U.S. District Court against the City for continuing violations of an effluent standard or limitation pursuant to CWA § 301(a), 33 U.S.C. § 1311(a), and the Regional Water Quality Control Board, Santa Ana Region, Water Quality Control Plan ("Basin Plan"), as the result of alleged unlawful discharges of sewage from the City's sewer

pipelines to Upper Newport Bay[1], Lower Newport Bay[2], Buck Gully Creek[3], Semeniuk Slough, and the Pacific Ocean - all waters of the United States.

The CWA regulates the discharge of pollutants into navigable waters. The statute is structured in such a way that all discharges of pollutants are prohibited with the exception of enumerated statutory provisions. One such exception authorizes a discharger, who has been issued a permit pursuant to CWA § 402, 33 U.S.C. § 1342, to discharge designated pollutants at certain levels subject to certain conditions. The effluent discharge standards or limitations specified in a National Pollutant Discharge Elimination System ("NPDES") permit define the scope of the authorized exception to the CWA § 301(a), 33 U.S.C. § 1311(a), prohibition, such that a violation of a permit limit places a discharger in violation of the CWA. River Watch alleges the City violates the CWA by discharging pollutants from a point source to a water of the United States without complying with CWA §§ 301(a) and 505(a)(1)(A), 33 U.S.C. §§ 1311(a) 1365(a)(1)(A).

The CWA provides that authority to administer the NPDES permitting system in any given state or region can be delegated by the Environmental Protection Agency ("EPA") to a state or to a regional regulatory agency, provided that the applicable state or regional regulatory scheme under which the local agency operates satisfies certain criteria (*see* 33 U.S.C. § 1342(b)). In California, the EPA has granted authorization to a state regulatory apparatus comprised of the State Water Resources Control Board ("SWRCB") and several subsidiary regional water quality control boards to issue NPDES permits. The entity responsible for issuing NPDES permits and otherwise regulating the City's operations of its sewage collection system in the region at issue in this Notice is the Regional Water Quality Control Board, Santa Ana Region ("RWQCB").

While delegating authority to administer the NPDES permitting system, the CWA provides that enforcement of the statute's permitting requirements relating to effluent standards or limitations imposed by the Regional Boards can be ensured by private parties acting under the citizen suit provision of the statute (*see* CWA § 505, 33 U.S.C. § 1365). River Watch is exercising such citizen enforcement to enforce compliance by the City with the CWA.

## NOTICE REQUIREMENTS

The CWA requires that any Notice regarding an alleged violation of an effluent standard or limitation, or of an order with respect thereto, shall include sufficient information to permit the recipient to identify the following:

### 1. The Specified Standard, Limitation, or Order Alleged to Have Been Violated

River Watch has identified discharges of sewage from the City's sewage collection system to waters of the United States in violation of CWA § 301(a), 33 U.S.C. § 1311(a), which states in part: "Except as in compliance with this section and sections 302, 306, 307, 318, 402, and 404 of

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[1] Upper Newport Bay (Ecological Reserve) is impaired for chlordane, copper, DDT, indicator bacteria, metals, nutrients, PCBs, pesticides, sediment toxicity, and sedimentation / siltation under CWA § 303(d).
[2] Lower Newport Bay is impaired for chlordane, copper, DDT, indicator bacteria, nutrients, PCBs, pesticides, and sediment toxicity under CWA § 303(d).
[3] Buck Gully Creek is impaired for fecal coliform and total coliform under CWA § 303(d).

this Act [33 U.S.C. §§ 1312, 1316, 1317, 1328, 1342, 1344], the discharge of any pollutant by any person shall be unlawful." These discharges are also in violation of RWQCB Order No. R8-2009-0030 ("Waste Discharge Requirements for the County of Orange, Orange County Flood Control District and The Incorporated Cities of Orange County within the Santa Ana Region Areawide Urban Storm Water Runoff - Orange County").

**2. The Activity Alleged to Constitute a Violation**

River Watch contends that from January -- 2013, to January -- 2018, the City has violated the Act as described in this Notice. River Watch contends these violations are continuing or have a likelihood of occurring in the future.

A. Collection System Surface Discharges Caused By Sanitary Sewer Overflows

Sanitary Sewer Overflows ("SSOs"), in which untreated sewage is discharged above ground from the sewage collection system prior to reaching Orange County Sanitation District Reclamation Plant No. 1 or Treatment Plant No. 2, are alleged to have occurred both on the dates identified in the California Integrated Water Quality System ("CIWQS") Interactive Public SSO Reports and on dates when no reports were filed by the City, all in violation of the CWA. The CIWQS "Spill Public Report – Summary Page" identifies **25** "Total Number of SSO locations," with **17,755** gallons total volume of SSOs. Of this total volume, the City admits at least **6,390** gallons, or 36% of the total, reached a surface water, impacting waterways and posing both a nuisance pursuant to California Water Code § 13050(m) and an imminent and substantial endangerment to health and the environment.

The below listed violations are reported by the RWQCB, and evidenced by the CIWQS SSO Reporting Program Database Records.

**14** - SSOs reported as reaching a water of the United States, as evidenced in CIWQS and in the City's records. As listed in CIWQS the event IDs of these violations are: 790843, 793398, 796210, 798972, 800928, 809695, 810857, 813023, 814609, 819486, 820380, 821957, 827461, and 843501.

All of these discharges are violations of CWA § 301(a), 33 U.S.C. § 1311(a), in that they are discharges of a pollutant (sewage) from a point source (sewage collection system) to a water of the United States without complying with any other sections of the Act. River Watch contends these violations are continuing in nature or have a likelihood of occurring in the future.

*Releases Reported*. The City's aging sewage collection system has historically experienced high Inflow and Infiltration ("I/I") during wet weather. Structural defects which allow I/I into the sewer lines result in a buildup of pressure which causes SSOs. Overflows caused by blockages and I/I result in the discharge of raw sewage into gutters, canals and storm drains which are connected to adjacent surface waters including Upper Newport Bay, Lower Newport Bay, Buck Gully Creek, Semeniuk Slough, and the Pacific Ocean.

As stated above and as recorded in CIWQS Public SSO Reports, the City's sewage collection system experienced at least 25 SSOs between January 28, 2013 and December 31, 2017, with a combined volume of at least 17,755 gallons – 6,390 gallons of which were reported as having reached surface waters. For example, on April 13, 2015 (Event ID# 814609), a sewage spill occurred at 747 Dover Drive caused by a root intrusion. The spill volume was estimated at 2,750 gallons, of which 2,000 gallons were recovered, and 750 gallons reached Newport Bay. On December 24, 2015 (Event ID# 820380), a spill of 2,000 gallons, also caused by root intrusion, occurred at Newport Center Drive and Civic Center Drive. Only 200 gallons were recovered. The remaining 1,800 gallons of wastewater entered a storm drain leading to Newport Bay. On February 9, 2016 (Event ID# 821957), a sewage spill caused by a structural failure in a force main occurred at 331 62nd Street. The estimated spill volume was 500 gallons, of which 200 were reported as recovered, and an estimated 300 gallons impacted Semeniuk Slough, a saltwater marsh.

*Discharges to Surface Waters*. River Watch's expert believes that many of the SSOs reported by the City as small volume were larger than reported, that those reported as having been contained without reaching a surface water did in fact discharge to surface waters, and that those reported as partially reaching a surface water did so in greater volume than stated. The claim of full containment is further called into question by the fact that nearly all of the SSO Reports filed by the City identify the estimated spill start time as the exact same time the reporting party first noticed the SSO. Studies have shown that most SSOs are noticed significantly after they have begun.

Since the volume of SSOs of any significance is estimated by multiplying the estimated flow rate by the duration, the practice of estimating a later than actual start time leads to an underestimation of both the duration and the volume. All but one of the City's reported SSOs are estimated to have begun at the same moment they were discovered, the only exception being a spill on March 15, 2017, occurring in a public restroom facility at 2401 Vista del Oro (Event ID# 833726). The estimated spill start time was reported as 11:45, the agency notification time and estimated operator arrival time are both reported as 12:00, with the spill end time as 02:00. The spill, caused by debris in a manhole, was estimated by the City at 675 gallons. The City's report claims that none of the wastewater was recovered, nothing reached a storm drain, and the spill's destination was "Unpaved surface". The location of this spill is approximately 2,000 feet to the east of Upper Newport Bay State Marine Conservation Area. While some areas where spills have occurred were dry at the time, the discharged pollutants remain on the surface of the land and enter receiving waters following rainfall or flooding.

In addition to identical spill start and operator notification times for all but Event ID# 833276, the majority of the City's SSO reports state the operator arrival time as being within 20 minutes or less of being notified of the spill. River Watch believes that many of these spills were far more significant than the City's reports disclose due to the highly unlikely time and volume estimations which do not account for the volume spilled before the City was notified.

An example River Watch finds very concerning is a spill taking place on February 9, 2015 at 207 Evening Canyon Road caused by a siphon failure which led to overflows in 2 manholes (Event ID# 813063). The City's SSO report states both the estimated start time of the spill and the agency notification time as 11:35, the operator arrival time as 12:00, and the end of the spill

just five minutes later, at 12:05. The spill volume was estimated at 1,500 gallons. None were reported as recovered. This SSO occurred several hundred feet from the Pacific shore of Little Corona Beach, yet the City's spill report claims that none of the wastewater reached a surface water. According to the spill report, "There is a large landscaped lawn area below the residence that appeared to capture the overflow." However, the Orange County Health Care Agency closed Little Corona Beach from February 9, 2015 to February 14, 2015 because of a ~1,500 gallon sewage spill attributed to the City of Newport Beach, noting, "~1,500 gallons spilled, 0 gallons recovered, ~1,500 gallons released". Monitoring data from February 10, 2015 shows an increase in total coliform, fecal coliform, and enterococcus at the sample points Little Corona Downcoast and Little Corona Upcoast.

River Watch contends that the City's estimates of spill durations, total spill volumes, gallons cleaned up, and gallons reaching surface waters are inaccurate. River Watch believes the City is failing to fulfill its legal obligation to report every spill to the CIWQS SSO public reporting system. River Watch contends the City is grossly underestimating the incidences and volume of SSOs which reach surface waters.

*Mitigating Impacts*. River Watch contends the City fails to adequately mitigate the impacts of SSOs. The City is a permittee under the Statewide General Requirements for Sanitary Sewer Systems, Waste Discharge Requirements Order No. 2006-0003-DWQ ("Statewide WDR") governing the operation of sanitary sewer systems. The Statewide WDR mandates that the permittee shall take all feasible steps to contain and mitigate the impacts of a SSO. The EPA's "*Report to Congress on the Impacts of SSOs*" identifies SSOs as a major source of microbial pathogens and oxygen depleting substances.

Numerous critical habitat areas exist within areas of the City's SSOs. Newport Bay supports a vast array of life including endangered and threatened species. The shores of Balboa Peninsula are critical habitat for the threatened western snowy plover. There is no record of the City performing any analysis of the impact of SSOs on critical habitat of protected species under the ESA, nor any evaluation of the measures needed to restore water bodies designated as critical habitat from the impacts of SSOs.

The Statewide WDR requires the City to take all feasible steps and perform necessary remedial actions following the occurrence of a SSO including limiting the volume of waste discharged, terminating the discharge, and recovering as much of the wastewater as possible. Further remedial actions include intercepting and re-routing of wastewater flows, vacuum truck recovery of the spill, cleanup of debris at the site, and modification of the sewage collection system to prevent further SSOs at the site. One of the most important remedial measures is the performance of adequate sampling to determine the nature and impact of the release. As the City is severely underestimating, and sometimes failing to report, SSOs which reach surface waters, River Watch contends that the City is not sampling enough of its SSOs.

*Compliance with the Municipal Separate Storm Sewer System (MS4) Stormwater Permit*. River Watch contends the City fails to adequately comply with the discharge prohibitions of its MS4 Permit (Order No. R8-2009-0030, NPDES Permit No. CAS618030), which states in relevant part:

"In accordance with the requirements of 40 CFR 122.26(d)(2)(i)(B) and 40 CFR 122.26(d)(2)(i)(F), the permittees shall prohibit illicit/illegal discharges (non-storm water) from entering into the municipal separate storm sewer systems unless such discharges are either authorized by a NPDES permit, or not prohibited in accordance with Section III.3, below." (Discharge Limitation / Prohibition III.1); "The discharge of storm water from the MS4s to waters of the US containing pollutants that have not been reduced to the maximum extent practicable is prohibited." (Discharge Limitation/Prohibition III.2); "The permittees shall effectively prohibit the discharge of non-storm water into the MS4s, unless such discharges are authorized by a separate NPDES permit or as otherwise specified in this provision." (Discharge Limitation/Prohibition III.3); and, "Discharges from the MS4s of storm water or non-storm water, as defined in Section III.3, shall not cause or contribute to a condition of pollution, contamination, or nuisance, as those terms are defined in Section 13050 of the Water Code." (Discharge Limitation/Prohibition III.7).

The City's MS4 is a system of conveyances intended to carry stormwater. It is connected to storm drain pipes which discharge into neighboring surface waters. However, SSOs bring sewage into the MS4 and in turn into waterways connected to, and downstream of, the MS4.

In practice, the addition of any SSO that results in a discharge of untreated or partially treated wastewater to waters of the United States is prohibited, and any SSO that results in a discharge of untreated or partially treated wastewater that creates a nuisance as defined in California Water Code § 13050(m) is prohibited (including SSOs whether or not they reach a surface water.) California Water Code § 13050(m) defines nuisance to mean "anything which meets all of the following requirements: (1) Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property. (2) Affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal. (3) Occurs during, or as a result of, the treatment or disposal of wastes.

B. Collection System Subsurface Discharges Caused by Underground Exfiltration

It is a well-established fact that exfiltration caused by pipeline cracks and other structural defects in a sewage collection system results in discharges to adjacent surface waters via underground hydrological connections.

River Watch contends that untreated sewage is discharged from cracks, displaced joints, eroded segments, etc., in the City's sewage collection system into groundwater hydrologically connected to surface waters including, but not limited to, Upper Newport Bay, Lower Newport Bay, Buck Gully Creek, Semeniuk Slough, and the Pacific Ocean. Surface waters become contaminated with pollutants including human pathogens. Chronic failures in the sewage collection system pose a substantial threat to public health. Studies tracing human markers specific to the human digestive system in surface waters adjacent to defective sewer lines in other systems have verified the contamination of the adjacent waters with untreated sewage.

Evidence of exfiltration can also be supported by reviewing mass balance data, I/I data, and video inspection, as well as tests of waterways adjacent to sewer lines for nutrients, human pathogens and other human markers such as caffeine. Any exfiltration found is a violation of the MS4 NPDES permit and therefore a violation of the CWA. During the course of discovery, River Watch will test surface waters adjacent to sections of the City's sewage collection system to determine the location and extent of exfiltration.

C. Impacts to Beneficial Uses

Upper Newport Bay, Lower Newport Bay, and the Pacific Ocean Nearshore Zone have many beneficial uses as defined in the RWQCB's Basin Plan. SSOs reaching these waters or their tributaries cause prohibited pollution by unreasonably affecting these beneficial uses.

**Upper Newport Bay** supports an incredible diversity of life. It is the largest functioning full tidal wetland, and one of the few remaining natural estuaries in Southern California. Fresh and salt water combine to form diverse habitats including intertidal mudflats, high salt marsh, salt panne, riparian, freshwater marsh, and upland. In recognition of the value of this rich and sensitive ecosystem, Upper Newport Bay is designated an Ecological Reserve and a State Marine Conservation Area. It serves as a spawning and nursery ground for many coastal fish species, an essential stopover for migrating birds along the Pacific Flyway, and home to nearly 200 species of birds. Among the many species which rely on Upper Newport Bay are the state and federally endangered Light-footed clapper rail, California least tern, Belding's savannah sparrow (listed as endangered by the State of California), and California black rail (state listed as threatened). The Salt marsh bird's-beak, a federally and state listed endangered plant, is also found in the marshes of Upper Newport Bay. The Basin Plan states beneficial uses of Upper Newport Bay as water contact and non-contact recreation, commercial and sportfishing, preservation of biological habitats of special significance, wildlife habitat, rare, threatened, or endangered species, spawning, reproduction, and development, marine habitat, shellfish harvesting, and estuarine habitat.

**Lower Newport Bay** is a deep basin coastal lagoon beginning where the Bay waters reach south of the Pacific Coast Highway Bridge. Lower Newport Bay is more developed than Upper Bay. Boating, fishing, and swimming are among its uses. According to the Basin Plan, the beneficial uses of Lower Newport Bay are navigation, water contact and non-contact recreation, commercial and sportfishing, wildlife habitat, rare, threatened, or endangered species, spawning, reproduction, and development, marine habitat, and shellfish harvesting.

**The Pacific Ocean** in the areas affected by the City's SSOs include highly popular destinations for swimming and surfing, and critical habitat for the federally threatened Western Snowy Plover. The ocean waters and tidepools off the coast of Newport Beach include the Robert E. Badham Area of Special Biological Significance, the Irvine Coast Area of Special Biological Significance, and portions of the Crystal Cove State Marine Conservation Area. These waters and tidepools support a great many species of marine life. According to the Basin Plan, the beneficial uses of the Pacific Ocean Nearshore Zone relevant to the City include industrial service supply, navigation, water contact and non- contact recreation, commercial and sportfishing, preservation of biological habitats of special significance, wildlife habitat, rare, threatened, or endangered species, spawning, reproduction, and development, marine habitat, and shellfish harvesting.

The introduction of human waste, via spills, exfiltration, storm drains, and SSOs, negatively effects countless species including the millions of people who swim in waters downstream of the City's sewage collection system. Heal The Bay's Beach Report Cards for 2015-2016 and 2016-2017 gave a wet weather year round grade of "F" to most sites in Newport Bay. Abalone Avenue Beach on Balboa Island received an "F" for the summer dry months of April – October 2017.

River Watch is extremely concerned regarding the effects of surface, underground, and unreported SSOs on critical habitat in and around the diverse and sensitive ecosystems of Newport Bay and the Orange County Coast, including risks to the health of those who recreate in, and consume fish from, those ecosystems.

**3. The Person or Persons Responsible for the Alleged Violation**

The entity responsible for the alleged violations identified in this Notice is the City of Newport Beach as well as those of its employees responsible for compliance with the CWA and any applicable state and federal regulations and permits.

**4. The Location of the Alleged Violation**

The location or locations of the various violations alleged in this Notice are identified in records created and/or maintained by or for the City which relate to its sewage collection system as further described in this Notice.

The City is located in the coastal center of Orange County, bordered to the north by the cities of Costa Mesa and Huntington Beach, to the east by the City of Irvine, the City of Laguna Beach to the south, and the Pacific Ocean to the west. The City's boundaries include the Upper Newport Bay Nature Preserve and Ecological Reserve, Upper Newport Bay State Marine Conservation Area, and the densely populated Balboa Island. The City encompasses approximately 53 square miles – 23.8 square miles of land and 29.2 square miles of water. The City's permanent population is approximately 87,127, which grows considerably in the summer months with up to 100,000 tourists daily.

**Sanitary Sewer System Description**

The Wastewater Division of the City's Municipal Operations Department is responsible for the operation and maintenance of the majority of residential and commercial sewage and wastewater collection services in the City. The City's sewage collection system consists of approximately 197 miles of gravity sewer, 4,922 manholes and cleanouts, 25,525 lateral connections, 21 pump stations, and 4.8 miles of force mains. Approximately 79% of the City's sewage collection system was constructed prior to 1980, with 23% built prior to 1960. The system is susceptible to structural failure due to internal corrosion and embrittlement as well as blockages from root intrusion at the joints.

Orange County Sanitation District ("OCSD") owns, operates, and maintains over 650 miles of trunk and sub-trunk sewers, 16 pump stations, two regional wastewater treatment plants

(Reclamation Plant No. 1 and Treatment Plant No. 2), and an ocean disposal system, serving approximately 2.5 million people in central and northwest Orange County. The City's service area is within OCSD Districts 5, 6, and 7. Wastewater from Districts 5 and 6 is conveyed to OCSD's Treatment Plant No. 2 in Huntington Beach, and wastewater from District 7 is pumped to Reclamation Plant No. 1 in Fountain Valley.

**5. The Date or Dates of Violations or a Reasonable Range of Dates During Which the Alleged Activity Occurred**

The range of dates covered by this Notice is January 22, 2013 through January 22, 2018. This Notice also includes all violations of the CWA by the City which occur during and after this Notice period, up to and including the time of trial.

**6. The Full Name, Address, and Telephone Number of the Person Giving Notice**

The entity giving notice is California River Watch, referred to throughout this notice as "River Watch," an Internal Revenue Code § 501(c)(3) nonprofit, public benefit corporation duly organized under the laws of the State of California. Its headquarters and main office are located in Sebastopol. Its mailing address is 290 South Main Street, #817, Sebastopol, CA 95472. River Watch is dedicated to protecting, enhancing, and helping to restore the surface waters and groundwaters of California including coastal waters, rivers, creeks, streams, wetlands, vernal pools, aquifers and associated environs, biota, flora and fauna, and educating the public concerning environmental issues associated with these environs.

River Watch may be contacted via email: US@ncriverwatch.org, or through its attorneys. River Watch has retained legal counsel with respect to the issues raised in this Notice. All communications should be directed as follows:


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## RECOMMENDED REMEDIAL MEASURES

River Watch looks forward to meeting with the City's staff to tailor remedial measures to the specific operation of the sewage collection system. In advance of that conversation, River Watch identifies the following issues for discussion that will advance compliance with the CWA and the Basin Plan, and help economize the time and effort the parties need to resolve their concerns:

1. Determining the specific sewage collection system repairs required and establishing deadlines for compliance;

2. Requiring implementation of an effective SSO reporting and response program;

3. Providing a lateral inspection and repair program;

4. Ensuring applications of chemical root control comply with federal EPA or RWQCB as well as manufacturer and Cal-OSHA requirements;

5. Keeping the Sewer System Management Plan ("SSMP") up to date and property certified;

6. Promoting staff training and education.

## CONCLUSION

The violations set forth in this Notice effect the health and enjoyment of members of River Watch who reside and recreate in the affected community. Members of River Watch use the affected watershed for recreation, swimming, fishing, horseback riding, hiking, photography, nature walks and the like. Their health, use and enjoyment of this natural resource is specifically impaired by the City's alleged violations of the CWA as set forth in this Notice.

CWA §§ 505(a)(1) and 505(f) provide for citizen enforcement actions against any "person," including a governmental instrumentality or agency, for violations of NPDES permit requirements and for un-permitted discharges of pollutants. 33 U.S.C. §§ 1365(a)(1) and (f), § 1362(5). An action for injunctive relief under the CWA is authorized by 33 U.S.C. § 1365(a). Violators of the Act are also subject to an assessment of civil penalties of up to $53,484.00 per day/per violation for violations pursuant to Sections 309(d) and 505 of the Act, 33 U.S.C. §§ 1319(d), 1365. *See also* 40 C.F.R. §§ 19.1 – 19.4. River Watch believes this Notice sufficiently states grounds for filing suit in federal court under the "citizen suit" provisions of CWA to obtain the relief provided for under the law.

The CWA specifically provides a **60-day** "notice period" to promote resolution of disputes. River Watch strongly encourages the City to contact counsel for River Watch within **twenty (20)** days of receipt of this Notice to initiate a discussion regarding the allegations detailed herein. In the absence of productive discussions to resolve this dispute, River Watch will have cause to file a citizen's suit under CWA § 505(a) when the 60-day notice period ends.

Very truly yours,

David Weinsoff

David J. Weinsoff

DW:lhm

*Service List*

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